



# Intermountain Forest Association

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March 20, 2016

Reviewing Officer  
c/o USDA Forest Service, Region 2, Rocky Mountain Region  
Attn: Objection Reviewing Officer – Planning Department  
740 Simms  
Golden, CO 80401

SUBJECT: SBEADMR Project -- Scott Armentrout, Responsible Official

Dear Sir or Madam:

The Intermountain Forest Association strongly supports and has participated in person and by submitting timely written comments throughout the development of the Spruce Beetle Epidemic and Aspen Decline Management Response Environmental Impact Statement (SBEADMR EIS) for the Grand Valley, Norwood, Ouray, Paonia, and Gunnison Ranger Districts of the Grand Mesa, Uncompahgre, and Gunnison NFs.

Having standing, we submit the following objections to portions of the SBEADMR Record of Decision and FEIS:

1. We disagree with reducing the acres from which potential treatment could take place under Alternative 2 from 718,000 acres down to 207,615 acres. This reduction in acreages decreases the implementation flexibility of the Forest Service to respond to changing conditions. Furthermore, by not including some areas within the analysis, additional NEPA will be required to move forward, if treatments in these areas are needed. This reduction reduces overall NEPA efficiency, which is critical with declining budgets.
2. The Scope and Scale of Actions reflects the ability of the Forest to conduct treatments based on likely funding and human resources that will be available. While we understand budgeting constraints, we would like to see a tiered approach based on what the resource needs in order to be resilient and sustainable through time. For instance, this is what should be done, and with this amount of

funding (current, 10% increase, 20% increase) we expect to be able to achieve these actions.

3. The background information included within the Draft Record of Decision overly emphasizes climate change as the primary driver responsible for the current spruce beetle epidemic occurring on the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests. While we don't disagree that climate change could be a factor, we feel strongly that the inadequate forest management and the suppression of fires have created a homogenous landscape that is very susceptible to insects and disease. We would like to see a discussion of forest conditions and how that contributed to the spruce bark beetle epidemic added to the background section of the ROD.
4. The updated Adaptive Management process includes an additional public notice and 30-day comment period on planned SBEADMR treatments. The information presented within the Draft Record of Decision does not clearly explain how comments submitted during the 30-day comment period will be utilized in terms of designing and approving projects. We are concerned that this process could be very cumbersome, requiring substantial employee hours that may be needed elsewhere. We are also concerned that this process could delay or even potentially stop treatments.
5. Within the Rationale for my Decision section of the ROD, we recommend that you add discussion of the Multiple-Use Sustained-Yield Act of 1960, which clearly states that one of the purposes of the acres identified as suitable timberlands is to provide timber. Although the draft ROD briefly discusses the concept of "a multiple-use agency with a mandate to actively manage forests" within the Meaningful Communication section, we feel it is not given the level of importance that it deserves. Chapter 60 (Forest Vegetation Resource Management) of the FSH 1909.12 (Land Management Planning Handbook) plainly outlines that "if timber production is compatible with the desired conditions and objectives of the plan", harvesting of timber with the purpose of "contributing to economic sustainability through the production of timber, pulp for paper, specialty woods for furniture, and fuel as a renewable energy source" is a legitimate use of National Forest lands.
6. On page 13 of the draft ROD, we recommend modifying the sentence starting with "Regarding" as follows – "Regarding the ASQ, as provided for in the National Forest Management Act, Section 13, Subsection b, the Forest may sell timber from salvage or sanitation harvest or in imminent danger from insect attack, over and above the plan volume." We further recommend that you delete the next sentence, starting with "The anticipated resiliency volume." The ASQ applies forestwide, not to individual projects.

7. Table 6 – Decision-Making Triggers for Adaptive Management Implementation in SBEADMR (FEIS pages 44-47):
- a. We recommend removing the three triggers regarding lynx and the SRLA. Since the SRLA already applies forestwide, by definition it already applies to implementation of the SBEADMR project; nothing is changed by listing them as SBEADMR triggers. Further, there is nothing “adaptive” about the three lynx-related triggers – the triggers merely restate SRLA requirements, albeit inaccurately as noted below.
  - b. Structural Diversity – The forest plan standard requires “5-12% or more (where biologically feasible)”; the Indicator should be modified to be consistent with the forest plan. The forest plan, and the Indicator, condition achievement of 5-12% in old growth forest on “where biologically feasible.” The various components of this trigger must be rewritten to accommodate the possibility that achievement of 5-12% in old growth forest may not be “biologically feasible” due to mortality from the spruce bark beetle epidemic. Specifically, percentages should be based on the acres of live vegetation, and even then, 5-12% in old growth may not be “biologically feasible.” The trigger should acknowledge that possibility, and include language that will not preclude harvest in that circumstance.
  - c. Thinning <3% of lynx habitat – Notwithstanding our general comment on the lynx/SRLA triggers above, this trigger is more restrictive than the SRLA because VEG S5 exceptions 4 and 5 are not included. Those should be added into this Trigger, including the Desired Condition, Yellow Light Trigger, Red Light Trigger, and Adaptive Actions.
  - d. Typo - In several of the Triggers, “mortality” is misspelled as “morality”.

8. Design Features – Appendix B

- a. Several Water Quality and Soil Productivity Design Features reference USDA Forest Service, 2006, i.e., the Watershed Conservation Practices Handbook. The Standards in the WCPH were not part of the GMUG NFs forest plan and, therefore, are not applicable to the SBEADMR project. Forest Service Handbook direction does not trump forest plan direction. Design Features that do not tier to the GMUG NFs forest plan should be deleted.
- b. WFRP-5 – This Design Feature should be rewritten to specify exactly where it is applicable and what will constitute “forested cover,” “hiding cover,” and “thermal cover” during implementation of the SBEADMR Project. For example, according to the forest plan, this direction applies to “arterial and collector roads,” but the Design Feature references “each NFS Road (Level 5 and below).” Further, considering the massive

mortality from the spruce bark beetle epidemic, it is very important to understand, up front, the meaning of “hiding and thermal cover”. Finally, “restricted use” of roads would partially alleviate the effects of this Design Feature, so clarification of that is also important.

- c. WFRP-6 – This Design Feature should be rewritten to add “Unless otherwise agreed in writing,” in order to allow on-the-ground flexibility.
- d. WFRP-17 – This Design Feature should be rewritten to 1) delete “Following basic conservation biology principles,” since those are not part of the GMUG NFs forest plan, 2) recognize that “Maintain or restore lynx habitat connectivity” is an Objective, not a Standard in SRLA direction, 3) recognize the natural habitat fragmentation and variability in the GMUG NF, and 4) delete the reference to Interagency Lynx Biology Team, 2013, since that is not part of the GMUG NFs forest plan.

Thank you.

*Tom Troxel*

Tom Troxel  
Executive Director